

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**IN RE:**

**Drew Anthony Crossland,**

**Debtor**

§  
§  
§  
§  
§

**Case No. 20-51430-CAG  
Chapter 7**

**Trustee's Response to the Motion of Evelin Crossland for Entry of an Order Granting Relief  
from the Automatic Stay Regarding Divorce Proceeding [Docket No. 16]**

TO THE HONORABLE CRAIG A. GARGOTTA, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW John Patrick Lowe, the Trustee in this case, makes and files this Response to the Motion of Evelin Crossland for Entry of an Order Granting Relief from the Automatic Stay Regarding Divorce Proceeding [Doc. No.16], and in support thereof respectfully represents to the Court as follows:

**1.**

The allegations in paragraph 1 of the motion are admitted.

**2.**

There allegations in paragraph 2 of the motion are admitted.

**3.**

The Trustee is without information or knowledge sufficient to form a belief as to the truth of the allegations in paragraph 3 of the motion and therefore denies those allegations.

**4.**

The Trustee is without information or knowledge sufficient to form a belief as to the truth of the allegations in paragraph 4 of the motion and therefore denies those allegations.

5.

There are no factual allegations for admission or denial in paragraph 5 of the motion for admission or denial.

6.


There are no factual allegations for admission or denial in paragraph 6 of the motion for admission or denial.

7.

The allegations in paragraph 7 of the motion are admitted.

8.

The Trustee doesn't object to the termination of the stay, as to the movant, for the purpose of establishing or modifying domestic support obligations or to proceed with the divorce. However, the automatic stay should remain in effect as to all assets of the bankruptcy estate.

SIGNED  day of September 2020.

Respectfully submitted,

  
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John Patrick Lowe, Trustee  
State Bar No. 12623700  
2402 East Main Street  
Uvalde, Texas 78801  
(830) 407-5115  
(830) 407-5117  
Email: pat.lowe.law@gmail.com

**CERTIFICATE OF SERVICE**

This is to certify that a true and correct copy of the above and foregoing Trustee's Response to the Debtors' Motion for Entry of Order Granting Relief from the Automatic Stay Regarding Divorce Proceeding [Doc. No. 16], have been served on the following parties listed below, by the CM/ECF system; by First Class mail, postage prepaid; or by electronic mail within 2 days of the electronic filing of this Motion on this the 22nd day of September, 2020.

**Debtor:**

Drew Anthony Crossland  
PO Box 1899  
San Antonio, TX 78297

**Attorney for Debtor:**


Michael V. Baumer  
7600 Burnet Road, Suite 530  
Austin, TX 78757  
By The CM/ECF System Only

**United States Trustee:**

Henry G. Hobbs, Jr.  
Acting United States Trustee  
US Trustee's Office  
615 E. Houston, Suite 533  
San Antonio, TX 78205  
By The CM/ECF System Only

**Attorney for Evelin Crossland:**

Thomas Rice  
Pulman, Cappuccio & Pullen, LLP  
2161 NW Military Highway, Suite 400  
San Antonio, TX 78213

  
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Patrick Lowe